

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**GRAHAM CHASE ROBINSON,**

*Plaintiff and Counterclaim Defendant,*

-against-

**ROBERT DE NIRO,**

*Defendant,*

and

**CANAL PRODUCTIONS, INC.,**

*Defendant and Counterclaim Plaintiff.*

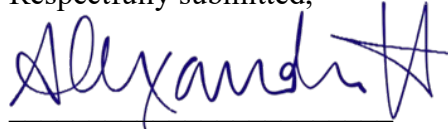
**Civil Action No. 1:19-CV-09156 (LJL) (KHP)**

**[PROPOSED] VERDICT FORM**  
**SUBMITTED BY PLAINTIFF**

The parties have been unable to reach agreement on a proposed verdict form. Accordingly, Plaintiff Graham Chase Robinson respectfully submits the following Proposed Verdict Form. Plaintiff Graham Chase Robinson reserves all rights to further amend the Proposed Verdict Form, including in response to rulings of the Court and evidence presented at trial.

Dated: October 5, 2023

Respectfully submitted,



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-against-

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**[PROPOSED] VERDICT FORM**

**PLEASE FOLLOW ALL INSTRUCTIONS,  
CHECK (✓) YOUR ANSWERS, AND FILL IN THE BLANKS**

**All Answers Must Be Unanimous**

**I. Ms. Robinson's Claims Against Mr. De Niro and Canal**

***Liability***

1. Do you find that Mr. De Niro is liable for gender discrimination against Ms. Robinson?

YES \_\_\_\_\_ NO \_\_\_\_\_

*If you answered YES to Question 1, you must also answer YES to Question 2 and then proceed to Question 3. If you answered NO to Question 1, proceed to Question 2.*

2. Do you find that Canal is liable for gender discrimination against Ms. Robinson?

YES \_\_\_\_\_ NO \_\_\_\_\_

*Regardless of how you answered Questions 1 and 2, proceed to Question 3.*

3. Do you find that Mr. De Niro is liable for retaliation against Ms. Robinson?

YES \_\_\_\_\_ NO \_\_\_\_\_

*If you answered YES to Question 3, then you must also answer YES to Question 4 and then proceed to Question 5. If you answered NO to Question 3, proceed to Question 4.*

4. Do you find that Canal is liable for retaliation against Ms. Robinson?

YES \_\_\_\_\_ NO \_\_\_\_\_

*If you answered YES to any of Questions 1, 2, 3, or 4, proceed to Question 5. If you answered NO to all of Questions 1, 2, 3, and 4, proceed to Question 11.*

### ***Damages***

5. How much money, if any, should Ms. Robinson be awarded for non-monetary damages, such as emotional distress?

Answer in Dollars and Cents: \$ \_\_\_\_\_

*Regardless of how you answered Question 5, proceed to Question 6.*

6. How much money, if any, should Ms. Robinson be awarded for monetary damages, such as back pay and out-of-pocket losses?

Answer in Dollars and Cents: \$ \_\_\_\_\_

*Regardless of how you answered Question 6, proceed to Question 7.*

7. How much money, if any, should Ms. Robinson be awarded for punitive damages?

Answer in Dollars and Cents: \$ \_\_\_\_\_

*Regardless of how you answered Questions 7, proceed to Question 8.*

## **II. Canal's Counterclaims Against Ms. Robinson**

### ***Liability***

8. Do you find that Ms. Robinson is liable for conversion of Canal's SkyMiles?

YES \_\_\_\_\_ NO \_\_\_\_\_

*Regardless of how you answered Question 8, proceed to Question 9.*

9. Do you find that Ms. Robinson is liable for breach of fiduciary duty against Canal?

YES \_\_\_\_\_ NO \_\_\_\_\_

*Regardless of how you answered Question 9, proceed to Question 10.*

10. Do you find that Ms. Robinson is liable for breach of the duty of loyalty against Canal?

YES \_\_\_\_\_ NO \_\_\_\_\_

*If you answered YES to either Question 8 or 9, proceed to Question 11. If you answered NO to both Questions 8 and 9 but answered YES to Question 10, proceed to Question 12. If you answered NO to all of Questions 8, 9, and 10, skip the remaining questions and proceed to the Signatures page.*

### ***Damages***

11. How much money, if any, should Ms. Robinson be ordered to pay to Canal for its monetary losses?

Answer in Dollars and Cents: \$ \_\_\_\_\_

*If you answered YES to Question 10, proceed to Question 12. If you answered NO to Question 10, skip the remaining questions and proceed to the Signatures page.*

12. During what date(s) or date range(s) from August 17, 2016, to April 6, 2019, if any, do you find that Ms. Robinson was substantially disloyal and should be ordered to repay her salary to Canal? (If none identified, write NONE.)

List Date(s) or Date Range(s) (include day/month/year):

\_\_\_\_\_  
*If you answered NONE to Question 12, proceed to the Signatures page. Otherwise, proceed to Question 13.*

13. For any period of time that you identified in response to Question 12, how much salary did Ms. Robinson earn that you find she should be ordered to repay to Canal?

Answer in Dollars and Cents: \$ \_\_\_\_\_

*Regardless of your answer, proceed to the Signatures page.*

**III. Signatures**

After completing the form, each juror who agrees with this verdict must sign below:

\_\_\_\_\_  
Foreperson

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Dated: \_\_\_\_\_